

Catholic Charities Disabilities Services		
Agency Standard and Procedure		
Standard Category	Residential	
Standard Title	Supervised IRA Billing	
Regulations	ADM 2014-01 ADM 2012-01 DOH Memorandum Subject: Retainer Days 7/29/19 ADM 2026-01 DRAFT	
Original Issue Date	06/02/2015	
Latest Revision Date	04/05/2016 01/24/2025 06/08/2023 03/17/2026 01/11/2024 08/03/2026	
Number of Pages	3	
Attachments		
Approved by: Paula Warika, Executive Director		

Standard:

Supervised IRA services will be provided and documented for billing following all appropriate laws, regulations and guidance. Present, therapeutic leave days, and retainer days are eligible for billing. Documentation will be prepared and presented to the Fiscal Department in a timely and appropriate manner.

Definitions:

- 1) Contemporaneous: To meet the minimum billing standards, the daily service notes or checklists must be completed by the end of the day no later than two (2) business days following the date the service was provided. The monthly summary notes must be completed no later than the end of the month following the month of service provision. For Supervised IRAs, business days are considered seven days of the week, Monday through Sunday, as it is a 24 hour service.
- 2) Presence in the IRA: spent the overnight hours in the IRA or was present in the IRA by 11:59 pm.
- 3) Provision of Services: CCDS staff deliver and contemporaneously document actions that are drawn from the Staff Action Plan (SAP) in the Life Plan during the service day billed.
- 4) Therapeutic leave day: a day when the individual does not spent overnight hours (leaves prior to midnight) physically at the IRA and the absence is for the purpose of visiting with family or friends or for a vacation.
- 5) Retainer day: any day during which an individual is on medical leave from the IRA or associated days when any other institutional or inpatient Medicaid payment is made for providing services for the individual.

Procedure:

Supervised IRA services are recorded on a daily basis.

- 1) Attendance is documented after 12:00 am, midnight, of the previous day.
- 2) Service days, therapeutic leave days and retainer days are eligible for billing.
- 3) Two standards must be met for billing for a service day: the presence of the individual in the IRA and the provision of staff actions providing face-to-face services.
In the circumstance of vacation or relocation due to an emergency circumstance, days when the IRA staff deliver and document at least one individualized face-to-face service or staff action are also countable as service days. The documentation must also clearly state the location of this off-site delivery site.
- 4) At least one individualized face-to-face service or staff action must be provided and contemporaneously documented on that date to meet the billing standard.
- 5) Supervised IRA services are described in the individual's SAP and address skill acquisition, skill retention, the individual's need for hands-on assistance related to living in the community, as well as exposure to new experiences.
- 6) The SAP includes activities or supports that are designed to help the person pursue or to maintain the outcomes that have value to the individual.
- 7) Therapeutic leave days must be described in the individual's SAP to be eligible for payment. The SAP must generally describe the purpose of therapeutic leave days and the general frequency of the leave.
- 8) Billable retainer days are based on the certified capacity operated by the agency, multiplied by 14. This is 14 days per rate year, multiplied by certified capacity.
- 9) The day of admission to the hospital is not billable as a service day but is counted as a retainer day. The day of discharge from a hospital may be billed as a service day if a service is provided and the individual sleeps at the IRA overnight. (A retainer day is not based on admission to hospital, for example when a person is at the ER for an extended period of time waiting to be seen, if they are still physically at the hospital and not returned to the IRA by midnight, it will be a retainer day.)
- 10) The required service documentation is a daily checklist with a monthly summary note. The monthly summary must describe the individual's response to services, address any issues or concerns and summarize the implementation of the individual's SAP.
- 11) Service documentation must be completed by the staff person who delivers the service or is knowledgeable of service delivery. If the service documentation is completed by someone other than the staff person delivering the service, the documentation must include a verification of service delivery by the staff who actually delivered the service.

- 12) QIDPs are responsible to ensure that each individual has a SAP that contains goals that require a daily billable encounter.
- 13) QIDPs are responsible to ensure that all individuals have an explanation of therapeutic leave in their SAP.
- 14) Documentation of billable services is completed contemporaneously using the appropriate Therap generated program.
- 15) If Therap is offline, documentation is to be handwritten by staff and entered later by the Residential Site Supervisor, Residential Regional Program Manager, Residential Program Manager, or Director of Residential Services. The written documentation is to be kept on file for ten years.
- 16) Documentation for billing is submitted to the Fiscal Department weekly.
- 17) Billing documentation will be reviewed by the Residential Finance Coordinator, or designee, weekly to ensure that it is accurate and complete.